

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

*

vs.

*

Criminal No. L-10-0355

KEVIN BURNETT, JR.

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MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes Kevin Burnett, Jr., Defendant, by Howard L. Cardin and Cardin & Gitomer, P.A., his attorneys, and moves this Honorable Court to pass an Order setting appropriate conditions of release and for reasons says as follows:

1. That the Defendant appeared before this Honorable Court on June 16, 2010, at which time this Court entered an Order detaining the Defendant.
2. That this matter has been dragging on for three years.
3. That the Defendant is being held at the Chesapeake Detention Facility which the Courts have recognized as being an inappropriate detention center for any length of time.
4. That the stress of incarceration under these circumstances for such a prolonged period of time is detrimental to his physical and mental health.
5. That because of his incarceration his two children (ages 10 and 4) are in the custody of his mother who is experiencing various difficulties.
6. That his release would permit him to provide the necessary parental supervision which children of these tender years require.

WHEREFORE, Kevin Burnett, Defendant, by Howard L. Cardin and Cardin & Gitomer, P.A. moves this Honorable Court to pass an Order setting appropriate conditions of release including home detention.

/S/

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CERTIFICATE OF MAILING

I hereby certify that on this 15th day of April, 2013, I filed the above electronically with the Clerk of the United States District Court using CM/ECF with copies to all counsel of record.

/S/

HOWARD L. CARDIN